

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CARLOS MARIN, KENNY LEBRON, and
MARTINA HANISCH, on behalf of themselves and all
others similarly situated,

Plaintiffs,

- against -

APPLE METRO, INC., et al.,

Defendants.

Case No. 12 Civ. 5274 (ENV)(CLP)

-related to-

Case No. 13 Civ. 1417 (ENV)(CLP)

SHAUNTA DOVE, on behalf of herself and all others
similarly situated,

Plaintiff,

- against -

APPLE METRO, INC., et al.,

Defendants.

**CONSENT TO JOIN
COLLECTIVE ACTION
LAWSUIT(S) REGARDING WAGES**

IF YOU RECEIVED THIS FORM AND WANT TO JOIN EITHER OR BOTH OF THESE LAWSUITS,
PLEASE COMPLETE THESE **TWO STEPS**:

1. COMPLETE AND SIGN THIS CONSENT TO JOIN LAWSUIT FORM; **AND**
2. USE THE ENCLOSED ENVELOPE TO RETURN THIS FORM TO THE ADDRESS BELOW
NOT LATER THAN APRIL 20, 2015.

Apple-Metro Collective Action
c/o CAA
PO Box 6877
Broomfield, CO 80021

YOU CAN ALSO COMPLETE THE FORM ONLINE AT: www.ApplebeesCase.com;
OR FAX IT TO 1-866-540-4423;
OR SCAN AND EMAIL IT TO: Join@ApplebeesCase.com

* * * *

- ☐ I consent to join the *Marin, et al., v. Apple-Metro, Inc., et al.*, No. 12-cv-5274 (ENV)(CLP) lawsuit
because I believe I was not paid for all the hours I worked at Applebee's;
- ☐ I consent to join the *Dove, et al. v. Apple-Metro, Inc., et al.*, No. 13-cv-1417 (ENV)(CLP) lawsuit
because I believe I did not receive all the tips that I was entitled to for my work at Applebee's.

I consent to join in one or both of the above collective action(s) brought in the United States District Court
for the Eastern District of New York and authorize The Ottinger Firm, P.C. and Borrelli & Associates,
P.L.L.C. to act on my behalf in all matters relating to this action, including any settlement of my claims.

SIGNATURE: 

PRINT NAME: Raheem Smith

07 / 06 / 2015

138 Thomasboyland st

Brooklyn ny 11233

Date

Address

City, State, Zip Code

(347)636-9127

Rahbillz@gmail.com

Telephone Number

Email Address

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AFFIDAVIT OF RAHEEM SMITH

Raheem Smith, of full age, being duly sworn, deposes and says:

1. I would like to participate as a party plaintiff in the *Marin* and *Dove* actions because I believe that Applebee's did not pay me all of the wages to which I was legally entitled during my employment.

2. I received a notice about these lawsuits in the mail. In early or mid-April 2015, I faxed a signed copy of the consent to join form to (I believe) the number provided on the Notice, from a fax machine at a local pharmacy.

3. When I called Plaintiffs' counsel July 6, 2015 to ask about the status of the lawsuits, I was informed that the law firm had not received the form that I attempted to fax prior to the deadline.

4. I would still like to participate in these lawsuits, and respectfully request that the Court permit me to do so, and that the date of my joining the lawsuits be counted as April 20, 2015 or prior.

5. I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on July 6, 2015
New York, New York

By: 
Raheem Smith